

**UNITED STATES BANKRUPTCY COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

In re	)	Case No. 18-23538-rdd
	)	
SEARS HOLDINGS CORPORATION, <u>et al.</u> ,	)	Jointly Administered
	)	
Debtors.	)	Chapter 11
	)	
	)	
	)	

**NOTICE OF APPEARANCE AND REQUEST FOR SPECIAL NOTICE AND  
INCLUSION IN MASTER MAILING LIST**

**PLEASE TAKE NOTICE** that Shaghal. Ltd. (“**Shaghal**”), a creditor herein, requests pursuant to Rules 1009(a), 2002(a), (b) and (g), and 9007 of the Federal Rules of Bankruptcy Procedure and Sections 102(1) and 342(a) and (c) of the United Bankruptcy Code, that all notices, papers and pleadings served or required to be served in this case, be given to and served upon:

Michael S. Kogan  
**KOGAN LAW FIRM, APC**  
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**PLEASE TAKE FURTHER NOTICE** that – pursuant to Rule 1009(a) of the Federal Rules of Bankruptcy Procedure – Shaghal requests that it be served with copies of all amendments to the Schedules and Statement of Financial Affairs, as applicable.

**PLEASE TAKE FURTHER NOTICE** that the foregoing demand includes not only the notices and papers referred to in the rules specified above, but also includes, without limitation, orders and notices of any application, motion, petition, pleadings, requests, complaint, or demand whether formal or informal, whether written or oral, and whether transmitted or conveyed by mail, delivery, telephone, telegraph, telex, or otherwise.

**PLEASE TAKE FURTHER NOTICE** that neither this Entry of Appearance nor any subsequent appearance, pleading, claim or suit, is intended to waive (i) this party's right to have final orders in noncore matters entered only after *de novo* review by a district judge, (ii) this party's right to trial by jury in any proceedings or trial so triable herein or in any case, controversy, or proceeding relating thereto, (iii) this party's right to have the reference withdrawn by the District Court in any matter subject to mandatory or discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs or recoupments to which this party is or may be entitled to under agreements, in law, in equity, or otherwise, all of which rights, claims, actions, defenses, setoffs and recoupments this party expressly reserves. Further, this Entry of Appearance constitutes a special appearance and is not to be deemed a consent to or waiver of the right to challenge the jurisdiction of the Bankruptcy Court under sovereign immunity or any other basis, which right is expressly reserved.

DATED: May 25, 2021

By: /s/Michael S. Kogan

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